

1 Scott C. Pitcock (pro se)

2 [Address and phone number omitted from public filing in accordance with Civil L.R. 5-1(c)(5);
3 contact information on file]

4 scott_pitcock@hotmail.com

FILED

JUN 10 2025

**CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

5
6
7
8 Amicus Curiae

9 Scott C. Pitcock (Pro Se)

10
11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14
15
16 AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, AFL-CIO, et al.,

17 Plaintiffs

18 v.

19 DONALD J. TRUMP, et al.,

20 Defendants.

21
22 Case No. 3:25-cv-03698-SI

23 **ADMINISTRATIVE MOTION TO FILE AMICUS BRIEF AND EXHIBITS UNDER**

24 **SEAL**

25 (CIVIL L.R. 7-11 and 79-5(C))

Pursuant to Civil Local Rules 7-11 and 79-5, Amicus Curiae Scott C. Pitcock respectfully moves to file under seal of unredacted versions of his Amicus Curiae Brief and attached exhibits.

The unredacted filings contain personally identifiable information (“PII”), internal agency email addresses, and documentation related to internal employee separations and credential management. Several exhibits contain direct scans of official agency correspondence, HR communications, and metadata that, if made public, could compromise the privacy rights of nonparties and inadvertently disclose sensitive internal information.

Partially redacted copies or placeholders for fully redacted documents have been prepared and will be submitted to the public docket concurrently, in compliance with Fed. R. Civ. P. 5.2 and Civil L.R. 79-5(d)(1)(C). These redactions are narrowly tailored and limited to only that information necessary to protect third-party privacy and internal agency data.

This Court and others within the Ninth Circuit have consistently recognized compelling reasons to seal documents containing nonparty PII, internal personnel records, and sensitive internal agency correspondence. See, e.g., *Foltz v. State Farm Mut. Auto Ins. Co.*, 331 F.3d 1122, 1137 (9th Cir. 2003); *Opperman v. Path, Inc.*, No. 13-cv-00453, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017).

Accordingly, Amicus respectfully requests the Court permit the following documents to be filed under seal:

1. Unredacted Amicus Curiae Brief

2. Exhibits:

- Exhibit A (Partial) – Statement of Scott C. Pitcock (contains direct identifiers)
- Exhibit B (Full) – Statement of [Employee B] (contains identifiers, nonparty privacy)
- Exhibit C (Full) – Statement of (Employee C) (contains identifiers, nonparty privacy)
- Exhibit D (Full) – Statement of (Employee D) (contains identifiers, nonparty privacy)

- Exhibit E (Full) – Declaration of (Employee E) + Internal Email Statements (contains identifiers, nonparty privacy)
- Exhibit F (Partial) – Email Logs – Forwarded from FDA Account (Redactions limited to names, internal email addresses, and other metadata)
- Exhibit G1 (Partial) – Postmarked Envelope + Termination Letter – Received May 12, 2025 (Redactions applied to non-official names, addresses, agency codes, barcode IDs, and personally identifiable metadata on envelope)
- Exhibit G2 (Partial) – Notice to Terminated Probationary Employees Required by The Honorable Judge Alsup’s April 19, 2025, Order + Westlaw Printout (redactions applied to agency codes)
- Exhibit H (Partial) – “Reinstatement to FDA position per 3/13/25 TRO” email from FDA Official (redactions applied to email identifier)
- Exhibit I (Partial) – Emails Affirming Continued Employment (redactions applied to names, email identifiers, PII, and other metadata)
- Exhibit M (Full) – Final Leave and Earnings Statement of Scott C. Pitcock (contains sensitive PII and financial information)

3. Any declarations or supplemental filings referencing sealed material

A [Proposed] Order granting this motion is submitted herewith, as required by Civil L.R. 79-5(d)(1)(B).

Amicus is a pro se filer and has made every effort to comply with applicable local and federal sealing procedures. This request is submitted in good faith to protect third-party privacy and internal agency data, without impairing the public’s access to the core facts and arguments raised in the accompanying brief.

1 Respectfully submitted,

2

3 Dated: June, 6, 2025

4 /s/Scott C. Pitcock (pro se)

5 Scott C. Pitcock

6 Amicus Curiae (Pro Se)

7 [Address on file / omitted in public version]

8 scott_pitcock@hotmail.com

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27